

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LIBERTY MUTUAL INSURANCE COMPANY,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	No. 96-10804-DPW
THE BLACK & DECKER CORPORATION,)	
BLACK & DECKER, INC., BLACK & DECKER)	1:04-CV-10683-DPW
(U.S.) INC., EMHART CORPORATION, and)	(W.W. Cross, NH
EMHART, INC.,)	[Tack pile])
Defendants.)	
)	

**LIBERTY MUTUAL INSURANCE COMPANY'S
PROPOSED DEPOSITION DESIGNATIONS**

Pursuant to Fed.R.Civ. P.26(a)(3)(B), Liberty Mutual Insurance Company submits the proposed deposition designations, which are appended hereto.

LIBERTY MUTUAL INSURANCE
COMPANY

By its attorneys,

/s/ Ralph T. Lepore

Ralph T. Lepore, III (BBO #294420)
Janice Kelley Rowan (BBO #265520)
HOLLAND & KNIGHT LLP
10 St. James Avenue
Boston, MA 02116
(617) 523-2700

Dated: March 14, 2005

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of March 2005 I caused a copy of the foregoing document to be served by hand upon Jack R. Pirozzolo, Esq., counsel for defendants, at Willcox, Pirozzolo and McCarthy, P.C., 50 Federal Street, Boston, MA 02110.

/s/ James M. Tierney

James M. Tierney

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JOHN E. MORTON, NOVEMBER 4, 1997

W.W. CROSS SITE (JAFFREY, N.H.)

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HAROLD G. SANDS, MARCH 13, 1999

W.W. CROSS SITE (JAFFREY, N.H.)

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ARTHUR J. CHRISTIAN, NOVEMBER 20, 1997

W.W. CROSS SITE (JAFFREY, N.H.)

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